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11 12 13 14 15	In re: Volkswagen 'Clean Diesel' Marketing, Sales Practices, and Products Liability Litigation  This document relates to:  Iconic Motors, Inc. v. Volkswagen Group of America, Inc., No. 3:17-cv-3185-CRB	PLAINTIFFS' NOTICE OF ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R.7-11 TO HAVE EXHIBITS IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT FILED UNDER SEAL PURSUANT TO CIVIL L.R. 79-5 by Plaintiffs:
16 17 18		Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.  Hon. Charles R. Breyer
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1	Plaintiffs, Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.,		
2	respectfully request, pursuant to Civil L.R. 7-11, that the Court enter an order that Exhibits 1-7 and		
3	Exhibits 10-15 attached to Defendants Robert Bosch GmbH and Robert Bosch LLC's Motion for		
4	Summary Judgment, and any references therein to said Exhibits, be filed under seal pursuant to Civil		
5	L.R. 79-5. Plaintiffs have a legitimate private interest that warrant sealing, will suffer injury if not		
6	sealed, and are unaware of a less restrictive alternative. As set forth in the accompanying		
7	Declaration of Danielle J. Gould in Support of Defendants' Administrative Request Pursuant to		
8	Civil L.R. 79-5, good cause exists for sealing the Exhibits and excerpts designated therein.		
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10	Dated: September 18, 2024	Respectfully submitted,	
11		<u>/s/ Danielle J. Gould</u> Ira M. Levin	
12		ilevin@burkelaw.com, pro hac vice Danielle J. Gould	
13		dgould@burkelaw.com, pro hac vice Joshua J. Cauhorn	
14		jcauhorn@burkelaw.com, pro hac vice BURKE, WARREN, MACKAY & SERRITELLA, P.C.	
15		330 North Wabash Avenue, 21st Floor	
16		Chicago, Illinois 60611 Telephone: 312.840.7000	
17		Facsimile: 312.840.7900	
18		Attorneys for Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.	
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28	Lead Case No. 15-md-02672- CRB PLAINTIFFS' NOTICE OF ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R.7-		

## **CERTIFICATE OF SERVICE** I hereby certify that on September 18, 2024, the within document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the attorneys of record in this case. /s/ Danielle J. Gould DANIELLE J. GOULD, pro hac vice Attorney for Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments,